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# MEMO ENDORSED

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August 9, 2021

**VIA ECF**

Hon. Kathleen H. Parker  
Daniel Patrick Moynihan Courthouse  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

*Re: T.C. et al. v. N.Y.C. Dept. of Educ.* 21-cv-4325(JMF)(KHP)

Dear Judge Parker:

I am Special Assistant Corporation Counsel in the office of Corporation Counsel Georgia Pestana, attorney for Defendant in the above-referenced action. Plaintiffs' counsel has now provided my office with all billing records and information required for me to review their claim and to seek authority from the Comptroller's Office to make a settlement offer to the Plaintiffs. My review of the billing records and settlement recommendation will be submitted to the Comptroller's office shortly.

I have spoken with plaintiff's counsel, Steven Alizio, regarding the upcoming initial conference presently scheduled to be held telephonically on Wednesday, August 11, 2021 at 10:00 a.m. (see ECF No. 17). The parties jointly and respectfully request that this conference be adjourned for a sixty-day time period to October 11, 2021 (or a date thereafter convenient for the Court) to allow the parties to independently achieve a settlement of this matter without the need to place any burden on the Court's schedule and resources. This is the first request for an adjournment of the Initial Case Management Conference. We respectfully make this request, and apologize for the late timing of the request, with the belief that this case can be settled, as is the case with the vast majority of these IDEA fee shifting cases.

Accordingly, the parties respectfully request that the initial conference for this matter be adjourned to October 11, 2021 or a date thereafter convenient for the Court.

**APPLICATION GRANTED:** The Initial Case Management Conference in this matter scheduled for Wednesday, August 11, 2021 at 10:00 a.m. is hereby rescheduled to Tuesday, October 19, 2021, at 10:45 a.m. Counsel for the parties are directed to call Judge Parker's AT&T conference line at the scheduled time. Please dial (866) 434-5269; access code 4858267.

**APPLICATION GRANTED**

*Katharine H. Parker*

Hon. Katharine H. Parker, U.S.M.J.  
08/10/2021

Thank you for considering this submission and request.

Respectfully submitted,

/s/

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Howard S. Krebs  
Special Assistant Corporation Counsel

cc: Steven Alizio, Esq. (via ECF)